

201-15963

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ExxonMobil
 Chemical

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June 27, 2005

Stephen L. Johnson
 Administrator
 U.S. Environmental Protection Agency
 P. O. Box 1473
 Merrifield, VA 22116

Re: High Production Volume (HPV) Chemical Challenge Program: Orphan Chemicals
 (ExxonMobil Chemical Company Registration Number

Dear Mr. Johnson:

ExxonMobil Chemical Company (EMCC) is strongly committed to the chemical industry's Responsible Care® program and takes seriously its commitment to the responsible manufacture, testing, and safe use of its products. As further evidence of this commitment, EMCC agreed to develop study summaries and hazard testing plans for over 130 chemicals under the U.S. Environmental Protection Agency (EPA) and International Council of Chemical Associations' High Production Volume (HPV) programs.

EMCC has previously communicated to the U.S. EPA our company's agreement to participate in HPV Chemical Challenge Program (Program). By copy of this letter, EMCC volunteers under the HPV Program for the following substances, which are listed as orphans in the 2004 U.S. EPA report, *Status and Future Directions of the High Production Volume Challenge Program*.

Chemical Name	CAS Number
Propane, 2,2'-oxybis (di-isopropyl ether)	108-20-3
Butane, 2,2'-oxybis (sec-butyl ether)	6863-58-7
Heptenone, methyl*	409-02-9**
Ketones, C12-branched*	68514-41-0**
9-Octadecanoic acid (9Z-, cobalt salt)	14666-94-5**

* These two chemical names and CAS numbers are used by EMCC to describe one by-product stream from the production of methyl ethyl ketone. The stream is composed of C8 and C12 ketones.

** Volunteered as a closed system intermediate that is recycled within the chemical plant in an environmentally sustainable manner, providing very limited potential for exposure.

In the 2004 U.S. EPA report, there are nine additional orphan substances for which EMCC is listed as manufacturing. By copy of this letter, EMCC does not volunteer for these substances for the reason listed with each substance below.

Chemical Name	CAS Number	Rationale for Not Volunteering
Decane	124-18-5	No longer manufactured and not reported by EMCC on the 1998 and 2002 IURs (note: this substance will be covered by the International Hydrocarbon Solvents Consortium through the OECD SIDS HPV Program)
Ethanedioic acid (oxalic acid), calcium salt (1:1)	563-72-4	No longer manufactured and not reported by EMCC on the 2002 IUR; reported on the 1998 IUR by an EMCC business unit that has become a separate company and is no longer part of EMCC
1,2-Butadiene*	590-19-2	EMCC is correcting its reporting for this CAS number and will report it as CAS #69103-05-5 (Hydrocarbons, C4-7, Butadiene Manuf. By-Product), which is included in the American Chemistry Council, Olefins Panel, HPV Crude Butadiene C4 Category
Phenol, nonyl derivs.	68081-86-7	No longer manufactured and not reported by EMCC on the 2002 IUR; reported on the 1998 IUR by an EMCC business unit that has become a separate company and is no longer part of EMCC
Fatty acids, tall-oil, reaction products with diethylene-triamine, acetates	68153-60-6	No longer manufactured and not reported by EMCC on the 1998 and 2002 IURs
1-Propanamine, 3-(tridecyloxy)-, branched	68511-40-0	No longer manufactured and not reported by EMCC on the 1998 and 2002 IURs
Disulfides, C5-12-alkyl	68513-62-2	This CAS number is included in the American Petroleum Institute HPV test plan for the Reclaimed Substances Category received by EPA on 17 December 2003
2-Butenedioic acid (2E)-, di-C8-18-alkyl esters	68610-90-2	No longer manufactured and not reported by EMCC on the 1998 and 2002 IURs
Benzene, ethylenated	68987-41-7	No longer manufactured and not reported by EMCC on the 2002 IUR; reported on the 1998 IUR by an EMCC business unit that has become a separate company and is no longer part of EMCC

* EMCC will submit form to notify EPA of the correction for this CAS number.

Please contact me if you require any further information on the status of EMCC commitments to the HPV Program.

Sincerely,

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